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KEUN TAEK PARK

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TOPPAN PHOTOMASKS, INC.,

Plaintiff,

vs.

KEUN TAEK PARK, an individual,

Defendant.

Case No. 3:13-cv-3323 MMC

AMENDED STIPULATION AND
~~PROPOSED~~ ORDER MODIFYING
PRETRIAL PREPARATION ORDER

Complaint Filed: July 17, 2013
Trial Date: April 20, 2015
Judge: Hon. Maxine M. Chesney

STIPULATION

Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park (collectively “the Parties”), have been engaging in settlement talks since the Court issued the June 20, 2014 Stipulation and Order Modifying Trial Prep Order (Dkt. No. 94), and continued progress is being made toward resolving this matter. In order to facilitate further settlement discussions, the Parties stipulate and request that the following dates in the Pretrial Preparation Order (Dkt. No. 53) and Stipulations and Orders Regarding Discovery (Dkt. Nos. 77 & 86 & 94) be modified as follows:

- Non-Expert Discovery Cutoff extended from September 12, 2014 to October 3, 2014;
- Designation of Experts extended from October 2, 2014 to October 24, 2014;
- Designation of Rebuttal Experts extended from October 24, 2014 to November 14, 2014;
- Expert Discovery Cutoff extended from November 14, 2014 to December 5, 2014;

Dispositive Motions filing deadline remains December 19, 2014. The Meet and Confer date (Civil Local Rule 16-10(b)(5)) remains March 3, 2015. The Pretrial Conference date remains April 7, 2015 at 3:00 pm and the Jury Trial date remains April 20, 2015 at 9:00 am, Courtroom 7, 19th Floor.

In addition, to facilitate further settlement discussions, the Parties further stipulate and request that:

(a) all discovery is stayed until September 2, 2014, after which the Parties may not serve new written discovery on each other without mutual agreement or order of the Court; and

(b) the filing of a briefing schedule stipulation and the further briefing ordered by Magistrate Judge Spero in his May 29, 2014 and June 17, 2014 Orders on TPI’s Motion for Sanctions be stayed until September 2, 2014, after which date the Parties shall file within eleven days a briefing schedule stipulation.

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SO STIPULATED.

DATED: August 13, 2014

THE BUSINESS LITIGATION GROUP, P.C.

By: /s/ Will B. Fitton
MARC N. BERNSTEIN
WILL B. FITTON

Attorneys for Defendant
KEUN TAEK PARK

DATED: August 13, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Danielle L. Ochs
DANIELLE L. OCHS
BECKI D. GRAHAM

Attorneys for Plaintiff
TOPPAN PHOTOMASKS, INC.

ATTESTATION OF CONCURRENCE IN FILING

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from Will B. Fitton.

DATED: August 13, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

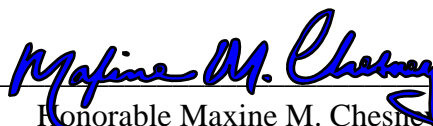
By: /s/ Danielle L. Ochs

Attorneys for Plaintiff
TOPPAN PHOTOMASKS, INC.

ORDER

IT IS SO ORDERED, with the exception of page 1, paragraph (b), which stipulation must be submitted for approval to Magistrate Judge Spero.

Dated: August 15, 2014


Honorable Maxine M. Chesney
United States District Judge

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